

Elzie, Teri L

mail

From: Zeisloft, Jamie
Sent: Tuesday, October 16, 2001 2:31 PM
To: 'Goldstein, Larry'; 'Gadbois.Larry@epamail.epa.gov'; susan.c.hughs@state.or.us; Elzie, Teri L; sharris@ucinet.com; Helen_Hillman@hazmat.noaa.gov; jjakabos@or.blm.gov; danl@nezperce.org; tom_obrien@r1.fws.gov; JosephRichards@ctuir.com; preston.sleeper@ios.doi.gov; Smith, Connie V; Teel, Darci D; viguelav@dfw.wa.gov; tzeilman@yakama.com; Zeisloft, Jamie; Sands, John P
Cc: Price, John (ECY); Ward, Dana C
Subject: RE: Will the Trustees Approve BRMaP?

0075546

Larry Gadbois/et al,

I discussed this matter with Dana and we're both of the opinion that BRMiS is more applicable to this situation than BRMaP (i.e. all of BRMiS applies while only Section 5 of BRMaP applies). It also sounds like mitigation action plans (MAP) are in order and could suffice for fulfilling CERCLA requirements. What do you think, would BRMiS and/or MAPs work?

Jamie

-----Original Message-----

From: Goldstein, Larry [mailto:lgol461@ECY.WA.GOV]
Sent: Tuesday, October 16, 2001 10:39 AM
To: 'Gadbois.Larry@epamail.epa.gov'; susan.c.hughs@state.or.us; tlelzie@bhi-erc.com; sharris@ucinet.com; Helen_Hillman@hazmat.noaa.gov; jjakabos@or.blm.gov; danl@nezperce.org; tom_obrien@r1.fws.gov; JosephRichards@ctuir.com; preston.sleeper@ios.doi.gov; Connie_V_Smith@rl.gov; ddteel@bhi-erc.com; viguelav@dfw.wa.gov; tzeilman@yakama.com; jamie_zeisloft@rl.gov
Cc: Price, John
Subject: RE: Will the Trustees Approve BRMaP?

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Thank you Larry for bringing this issue to our attention and asking an important question.

At the last meeting Jamie noted that there had been changes in I&I language, and the I&I text needed clarification in BRMiS. There are a few pending action items for Jamie that will enable the trustees to discuss these issues as planned at the next meeting:

- 1) trustees get a hard copy of BRMaP
- 2) trustees see revised I&I text via email
- 3) agenda item to form an I&I workgroup

At our next meeting we need to allow adequate time to discuss approval of BRMaP. How much time will be needed depends on the issues raised in our review. Once we get the revised I&I text I'll schedule a conference call.

Thanks.

-----Original Message-----

From: Gadbois.Larry@epamail.epa.gov
[mailto:Gadbois.Larry@epamail.epa.gov]
Sent: Tuesday, October 16, 2001 9:07 AM
To: susan.c.hughs@state.or.us; tlelzie@bhi-erc.com; Goldstein, Larry; sharris@ucinet.com; Helen_Hillman@hazmat.noaa.gov; jjakabos@or.blm.gov; danl@nezperce.org; tom_obrien@r1.fws.gov; JosephRichards@ctuir.com; preston.sleeper@ios.doi.gov; Connie_V_Smith@RL.gov; ddteel@bhi-erc.com; viguelav@dfw.wa.gov; tzeilman@yakama.com; jamie_zeisloft@RL.gov
Cc: Price, John; Gadbois.Larry@epamail.epa.gov
Subject: Will the Trustees Approve BRMaP?

Hanford Trustees:

As we heard at the last trustees meeting, DOE/RL (Keith Klein) has approved the BRMaP. The EPA has included requirements for revegetation/habitat restoration in several legally binding documents (RODs, Remedial Design Reports/Remedial Action Work Plans). Rather than try to put the specifics of the requirements into those documents, they made forward reference to the upcoming BRMaP as the master plan for how to do such work. Now DOE has approved the document (it is acceptable in DOE's eyes as fulfilling their requirements for management of biological resources). EPA is in the position of needing to determine if following that document fulfills the requirements dictated in CERCLA documents. I am very much relying on the Trustees to help us make this determination. The trustees (especially via Dan) has had a long history of working on this document. I would like to know if the trustees are going to formally approve this document. I don't want to be in the position of approving a document as satisfying previous commitments, and continue to reference it in future documents, and then at a future date have the Trustees say we're not doing the right thing.

I look forward to a Trustee action on this issue.

--Larry--